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September 18, 2001

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *In the Matter of Notice of Rulemaking Amendment of Regulations for Telephone Service Providers*
Docket No. 00-00873

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of a Request by Industry Members for Extension of Deadline to Submit Comments. This request was raised in conversations between Mr. Fox of BellSouth and Eddie Roberson on September 12, 2001. Copies have been served on the parties of record.

Cordially,



Joelle Phillips

JP/jej

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *In the Matter of Notice of Rulemaking Amendment of Regulations for Telephone Service Providers*

Docket No. 00-00873

REQUEST BY INDUSTRY MEMBERS FOR
EXTENSION OF DEADLINE TO SUBMIT COMMENTS

The following entities ("Industry Members") submit this request for a 30-day extension of the deadline for submission of comments:

Ardmore Telephone Company, Inc.
ASCENT
AT&T
BellSouth Telecommunications, Inc.
CenturyTel of Adamsville, Inc.
CenturyTel of Claiborne, Inc.
CenturyTel of Ooltewah-Collegedale, Inc.
Citizens Communications
Crockett Telephone Company, Inc.
Loretto Telephone Company, Inc.
MCI WorldCom, Inc.
NewSouth Communications Corporation
Peoples Telephone Company
SECCA
Sprint Communications Company L.P.
TEC
TDS Telecom
Time Warner Telecommunications
United Telephone Company
United Telephone-Southeast, Inc.
U.S. LEC
West Tennessee Telephone Company, Inc.
XO Communications

By its Order dated August 16, 2001, the TRA established a deadline of Wednesday, September 19, 2001, for the submission of comments concerning the TRA's proposed language for rules establishing service standards. Notwithstanding their efforts to date to review and

evaluate the proposed rules, for the following reasons, the Industry Members respectfully request an extension of that deadline until October 19, 2001.

First, additional time will enable the Industry Members to more carefully consider and determine aspects of the actual effect of the proposed rules on their respective operations. In light of the broad scope of the proposed rules, and the numerous revisions and changes as compared with the prior proposed rules, the Industry Members must evaluate the effect on their respective businesses of application of the new proposed rules in order to formulate their response. To date, the Industry Members have been unable to complete the evaluation, which in many instances requires review and analysis of historical data. If required to respond without the extension, the Industry Members believe that their response is likely to be less well considered, due to lack of time to determine with any confidence the actual effect of application of the proposed rules. Based on efforts to date to consider the effect of the rules at issue, the Industry Members expect that additional time will facilitate their review and enable them to identify those proposed standards that may be of only limited or no concern.

Second, the Industry Members have identified substantial new issues raised by the proposed rules, which were not encompassed in earlier drafts or discussed at earlier workshops. Accordingly, Industry Members need additional time to evaluate such new issues and to conduct the necessary investigations and calculations to determine the effect of these new issues. Several of these issues will require a significant amount of analysis by the Industry Members. The complexity of many of these issues has been apparent throughout the proceedings in this docket and is demonstrated, for example, by the substantial period of time required by the Authority to produce the latest proposed rules after the conclusion of the last workshop in February. Just as it was necessary for the Authority to spend a significant amount of time in order to digest the

information from the workshops and revise the proposed rules, Industry Members believe it will take some further time to analyze and respond to some of the complex issues raised by the latest draft of the proposed rules.

For the foregoing reasons, the Industry Members respectfully request that the deadline for comments be extended until October 19, 2001. BellSouth has been authorized to submit this pleading on behalf of the Industry Members.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: Charlie Howorth

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(615) 214-6520

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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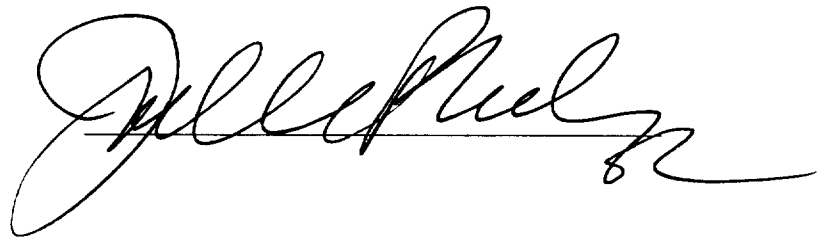
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Tim Smoak
Regulatory Manager
US LEC Corporation
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A handwritten signature in black ink, appearing to read "Timothy Phillips", written over a horizontal line.